

I urge the Commission to reject RM-11306 because it tries to fix a problem created by old and “ossified” regulations with new regulations that will eventually become old and “ossified” them selves.

A competing petition for rulemaking RM-11305 submitted by the CCT is calling for a de-regulatory solution and the abandonment of the regulatory mode-based sub-band structure currently used in amateur radio. This is the direction that amateur radio should be taking.

I do not believe that regulating modes by bandwidth is a viable solution for radio amateurs because it will again lead to overcrowding problems, and the outlawry of legacy modes despite the inclusion, by footnote, of DSB-AM phone with a 9-kHz grandfathered bandwidth. The camel’s nose has already been thrust into the tent by this petition’s omission of ISB and presumably DSB-suppressed carrier AM phone from HF. The mention of MCW for station identification is a welcome return of a traditional mode to HF, but I don’t want to see any legacy mode squeezed out now or later by bureaucratic reinterpretation of the rules.

I don’t feel that regulation by bandwidth is the solution to any of the overcrowding problems facing the amateur bands. A regulatory approach is always less flexible, and this petition amounts to an expansion of the (largely SSB) phone sub-bands at the expense of the current CW sub-band that are already shared with data stations. If in fact RM-11306 is meant to encourage the growth of data and other advanced modes, I ask what is holding back the data enthusiasts from the already allocated CW/data sub-bands that the proponents claim are underutilized?

Let the Commission please adopt the policy of deregulation and voluntary band plans in effect in many other countries, including Canada. With the knowledge that the US is alone in the world with sub-bands by mode, I kindly ask that RM-11306 be rejected in favor of voluntary band plan.

Respectfully submitted,

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